

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

ORIGINAL

UNITED STATES OF AMERICA	§	
	§	No. 1:21-CR-38
v.	§	Judge Crone
	§	
STEPHEN JOHN PIEPER	§	

FILED 12/9/21
US DISTRICT CLERK
DAVID O'TOOLE
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FACTUAL BASIS

The defendant, **Stephen John Pieper**, stipulates and agrees that the following facts are true and correct:

1. The defendant, **Stephen John Pieper (Pieper)**, who is changing his plea to guilty, admits that he is the individual charged in the Indictment.
2. As charged in Count One of the Indictment, on or about November 1, 2016, in the Eastern District of Texas, **Pieper** knowingly employed, used, persuaded, induced, enticed, and coerced Victim 1 to engage in sexually explicit conduct for the purpose of creating a visual depiction of such conduct.
3. **Pieper** admits that at the time of the offense, he knew that Victim 1 was a minor who had not yet attained the age of 16-years old.
4. **Pieper's** cellular phone captured videos of Victim 1 sitting with her legs spread apart facing the camera using her fingers to spread her vagina, which is the focus of the image. **Pieper** acknowledges that the images constitute child pornography under 18 U.S.C. § 2256. **Pieper** further admits that the sexual exploitation of Victim 1 involved the commission of a sexual act or sexual contact as defined in 18 U.S.C. § 2246.

5. **Pieper** then uploaded or caused to be uploaded the videos and images into Snapchat accounts he used, possessed, and exercised control over.

6. As part of relevant conduct, **Pieper** further admits that he similarly recorded Victim 1 on multiple occasions between September of 2016 and August of 2017.

7. As charged in Count Two of the Indictment, on or about July 15, 2018, in the Eastern District of Texas, **Pieper** knowingly employed, used, persuaded, induced, enticed, and coerced Victim 2 to engage in sexually explicit conduct for the purpose of creating a visual depiction of such conduct.

8. **Pieper** admits that at the time of the offense, he knew that Victim 2 was a minor who had not yet attained the age of 16-years old.

9. **Pieper's** cellular phone captured videos of Victim 2 naked exposing her anus and vagina to the camera with a male's hand touching her vagina, which is the focus of the image. **Pieper** acknowledges that the images constitute child pornography under 18 U.S.C. § 2256. **Pieper** further admits that the sexual exploitation of Victim 2 involved the commission of a sexual act or sexual contact as defined in 18 U.S.C. § 2246.

10. **Pieper** then uploaded or caused to be uploaded the videos and images into Snapchat accounts he used, possessed, and exercised control over.

11. As part of relevant conduct, **Pieper** further admits that he similarly recorded Victim 2 on multiple occasions between July 15, 2018 and November 20, 2018.

12. As charged in Count Three of the Indictment, on or about July 30, 2017, in the Eastern District of Texas, **Pieper** knowingly employed, used, persuaded, induced,

enticed, and coerced Victim 3 to engage in sexually explicit conduct for the purpose of creating a visual depiction of such conduct.

13. **Pieper** admits that at the time of the offense, he knew that Victim 3 was a minor who had not yet attained the age of 16-years old.

14. **Pieper's** cellular phone captured videos of Victim 3 exposing her vagina to the camera, which is the focus of the image. **Pieper** acknowledges that the images constitute child pornography under 18 U.S.C. § 2256. **Pieper** further admits that the sexual exploitation of Victim 3 involved the commission of a sexual act or sexual contact as defined in 18 U.S.C. § 2246.

15. **Pieper** then uploaded or caused to be uploaded the videos and images into Snapchat accounts he used, possessed, and exercised control over.

16. As part of relevant conduct, **Pieper** further admits that he similarly recorded Victim 3 on multiple occasions between August 28, 2016 and November 26, 2017.

17. **Pieper** admits that he used his Apple iPhone 6s cellular phone, to create a visual depiction of Victim 1, Victim 2, and Victim 3 engaging in sexually explicit conduct. **Pieper** acknowledges that Apple iPhones are not manufactured in the United States and thus the devices themselves traveled in interstate and foreign commerce.

18. **Pieper** also acknowledges that the software program he used to upload the Apple iPhone cellular phone to record Victim 1, Victim 2, and Victim 3 required use of the Internet, a means and facility of interstate and foreign commerce. Similarly, **Pieper**

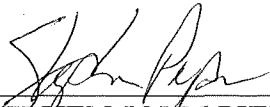
used the Internet to upload and transmit the videos and images of Victim 1, Victim 2, and Victim 3 into his Snapchat account.

19. **Pieper** admits that this conduct occurred in Lumberton, Hardin County, Texas, within the Eastern District of Texas.

SIGNATURE AND ACKNOWLEDGMENT BY DEFENDANT
STEPHEN JOHN PIEPER

I have read this Factual Basis and have discussed it with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that it accurately describes my acts.

Dated: 12/9/21

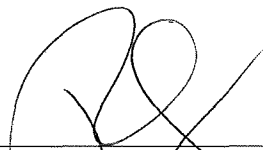


STEPHEN JOHN PIEPER
Defendant

SIGNATURE AND ACKNOWLEDGMENT BY ATTORNEY FOR DEFENDANT

I have read this Factual Basis and the Indictment and have reviewed them with my client. Based upon my discussions with my client, I am satisfied that my client fully understands the Factual Basis.

Dated: 12/9/21



RYAN GERTZ
Attorney for the defendant

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY

Dated: 12-9-21

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